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ABSTRACT

This policy update discusses key aspects of the Job Training Reform Amendments of 1992 (Public Law 102-367) that have potential implications for transition services for individuals with disabilities. The discussion focuses on participant eligibility, criteria established for "hard-to-serve" individuals, support for training and employment programs addressing transition, interagency coordination, Private Industry Council membership, performance standards, nondiscrimination protections, and authorization of state-level Human Resource Investment Councils. A table displays state-by-state participation rates for program year 1991, indicating the number of adults and youth who "terminated" from job training programs and the number and percentage of these "terminees" that have disabilities. Strategies for increasing program participation levels among youth and adults with disabilities are outlined. (JDD)

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National Transition Network

Policy Update

Spring 1993

ED 380 942

Job Training Reform Amendments of 1992

Expanded Opportunities for Youth and Adults with Disabilities

On September 7, 1992, the Job Training Reform Amendments of 1992, Public Law 102-367, were signed into law. The Amendments modify existing legislation, Public Law 97-300. Interim final regulations for the Job-Training Reform Amendments were published in the December 29, 1992, issue of the Federal Register, vol. 57 (pp. 62004-62073). Final rules are expected to be published on or around June 1, 1993, and remain substantially the same as published in the December 29 Federal Register. The purpose of this Policy Update is to present and discuss key aspects of the law and interim final rules that have potential implications for transition services nationally. We wish to acknowledge Mr. Paul Hippolitus, of the President's Committee on Employment of People with Disabilities, Washington DC, who provided the major portion of the narrative for reproduction in this Policy Update.

■ Participant Eligibility

The Job Training Reform Amendments of 1992 and the interim final rules expand the provisions of participant eligibility for youth and adults with disabilities. These changes in the law and subsequent regulatory language afford youth and adults with disabilities new and expanded opportunities to participate in a variety of training and employment programs. Procedures and criteria for determining participant eligibility are among the more significant changes.

The interim final rules contain two key parts relating to the Job Training Partnership Act (JTPA) eligibility for persons with disabilities. The first states that for the purpose of determining program eligibility, "persons receiving Supplemental Security Income (SSI) under Title XVI of the Social Security Act, will not have their SSI counted as income when determining eligibility" *Federal Register, vol. 57* ([Eligibility Determination and Intake], p. 62020).

The second major point contained within the interim final rules states that "an individual with a disability may [emphasis added], for the purpose of income eligibility determination, be considered to be an unrelated individual who is a family unit of one" *Federal Register, vol. 57* ([Definitions] p. 62029).

With regard to the latter point ("family of one" authority), there are two key considerations. First, in order to be implemented, the governor of each state must reiterate this policy within the state job-training plan. Second, under the prior rules, only youth with disabilities could be afforded this advantage. Now the advantage is extended to both youth and adults with disabilities. This is an important development that helps to support the postschool transition participation of adults with disabilities in JTPA-sponsored training and employment programs.

Earlier this year, the U.S. Department of Labor published its *Title II Eligibility Documentation and Technical Assistance Guide* (1993), which clarifies how disability status will be determined by JTPA intake workers. JTPA determinants include:

- ❑ Letter from drug or alcohol rehabilitation agency
- ❑ Letter from child-study team stating specific disability
- ❑ Medical records
- ❑ Observable condition (applicant statement needed)
- ❑ Physician's statement

EC 303816

The National Transition Network is a collaboration of the University of Minnesota; University of Vermont; Colorado State University; University of Arkansas; University of Illinois, Urbana-Champaign; Technical Assistance for Parent Programs; and PACER Center (Parent Advocacy Coalition for Educational Rights). Its headquarters are at the Institute on Community Integration (UAP), University of Minnesota, Pattee hall, 150 Pillsbury Dr. SE, Minneapolis, MN 55455, (612) 626-8200.

- ❑ Psychiatrist's diagnosis
- ❑ Psychologist's diagnosis
- ❑ Rehabilitation evaluation
- ❑ School records
- ❑ Sheltered workshop certification
- ❑ Social service records
- ❑ Social Security Administration disability records
- ❑ Veterans Administration letter/records
- ❑ Vocational Rehabilitation letter
- ❑ Workers Compensation record

If you are interested in receiving a copy of the *Title II Eligibility Documentation and Technical Assistance Guide*, write to: Hugh Davies, U.S. Department of Labor, Employment and Training Administration, Room N-4709, 200 Constitution Avenue NW, Washington, D.C. 20202; or call (202) 219-5580. The guide provides other useful information to assist youth and adults with disabilities in completing the participant eligibility process.

■ Criteria Established for "Hard-to-Serve" Individuals

In an effort to address the often-discussed "creaming" issue, the new amendments mandate services to the "hardest-to-serve" population. Section 263(b)(d) specifically defines "hard-to-serve" in-school and out-of-school youth as persons from 16 to 21 years of age. To be eligible for JTPA services, youth must first be identified as economically disadvantaged, unless enrolled in a school-wide project for low-income schools. Remember that under each state governor's order, youth with disabilities can be considered a family of one when determining economic eligibility. The Job Training Reform Amendments go on to state that for youth who are in school:

> *Not less than 65% of the in-school individuals who participate in a program under this part shall be individuals who are included in one or more of the following categories:*
>
> *(1) Individuals who are basic-skills deficient.*
> *(2) Individuals with educational attainment that is one or more grade levels below the grade level appropriate for the age of the individuals.*
> *(3) Individuals who are pregnant or parenting.*
> *(4) Individuals with disabilities, **including a learning disability** [emphasis added].*
> *(5) Individuals who are homeless or runaway youth.*
> *(6) Individuals who are offenders.*
> *(7) Individuals within a category established under subsection(h).*

At least 50% of the total participants in each service delivery area (SDA) must be out of school. For youth who are out of school, the Amendments specify that:

> *Not less than 65% of the out-of-school individuals who participate in a program under this part shall be individuals who are included in one or more of the following categories:*
>
> *(1) Individuals who are basic-skills deficient.*
> *(2) Individuals who are school dropouts.*
> *(3) Individuals who are pregnant or parenting.*
> *(4) Individuals with disabilities, **including a learning disability** [emphasis added].*
> *(5) Individuals who are homeless or runaway youth.*
> *(6) Individuals who are offenders.*
> *(7) Individuals within a category established under subsection(h).*

The Job Training Reform Amendments of 1992 also define hard-to-serve adults. As with the provisions for the hardest-to-serve in-school and out-of-school youth, eligible adult participants must first be economically disadvantaged and then fit one or more of the criteria listed below in order to be included in the mandatory 65%. With adults, the 10% rule is continued, but modified. That is to say, "Not more than 10% of participants . . . may be individuals who are not economically disadvantaged, if such individuals are age 22 or older and within one or more categories (those listed below)." To qualify as economically disadvantaged, adults must be one or more of the following:

> *(1) Individuals who are basic-skills deficient.*
> *(2) Individuals who are school dropouts.*
> *(3) Individuals who are recipients of cash welfare payments, including recipients under the JOBS Program.*
> *(4) Individuals who are offenders.*
> *(5) Individuals **with disabilities** [emphasis added].*
> *(6) Individuals who are homeless.*
> *(7) Individuals who are established under a category established under subsection(d).*

■ Training and Employment Programs Addressing Transition

The Job Training Reform Amendments of 1992 support a variety of transition programs and services. For example, under *Title II, Part A, Adult Training Program*, not more than 30% of funds available to an SDA may be used for administrative costs and support services. New in the law is a clarification of what was meant previously by *materials for the handicapped*. Now, support services may also include "materials for individuals with disabilities' job coaches."

This provision offers exciting opportunities for JTPA to sponsor supported employment job coaches. This advantage, however, is not meant to exclude the expenditure of regular training funds by other responsible agencies for job coaches. It is an added way to support this expense. This provides an excellent opportunity for state and local JTPA, education, vocational rehabilitation, and human service agencies to collaborate and develop resource-pooling and cost-sharing strategies when providing meaningful job supports for individuals with disabilities

The new amendments also promote the importance *and* availability of transition services under *Title II, Part C, Youth Training Program* provisions. In the statement of purpose (Section 261), the amendments state, "it is the purpose of the programs assisted under this part to . . . assist youth in addressing problems that impair the ability of youth to make successful transitions from school to work, apprenticeship, the military, or postsecondary education and training." Specific types of transition services are identified within Section 204(c)(1)(2). Services which may be available to youth with funds provided under Part C may include:

(1) Direct training services, including —
(A) the services described in Section 204(b)(1);
(B) tutoring and study skills training;
(c) alternative high school services within programs that meet the requirements of Section 141(o)(1);
(D) instruction leading to high school completion or the equivalent;
(E) mentoring;
(F) limited internships in the private sector;
(G) training or education that is combined with community and youth-service opportunities in public agencies, non-profit agencies, and other appropriate agencies, institutions, and organizations, including Youth Corps Program;
(H) entry employment experience program;
(I) school-to-work transition services;
(J) school-to-postsecondary education transition services;
(K) school-to-apprenticeship transition services; and
(L) pre-employment and work maturity skills training; and

(2) training-related and supportive services, including —
(A) the services described in Section 204(b)(2);
(B) drug and alcohol abuse counseling and referral;
(C) services encouraging parental, spousal, and other significant adult involvement in the program of the participant; and
(D) cash incentives and bonuses based on attendance and performance in a program.

■ Interagency Coordination

Certain provisions of the law also call attention to the importance of interagency coordination and collaboration in the design and delivery of appropriate employment and training programs that assist youth in the transition from school to work and community living. Under Section 123(c), titled *Governors' Plan Requirements*, state education agencies are required to submit for full inclusion in the Governors' Coordination and Special Services Plan, a description developed jointly by the state education agency and the governor of —

(1) the goals to be achieved and services to be provided by the school-to-work transition programs specified in Subsection (a)(2)(A) that will receive the assistance, which description shall, at a minimum, include information regarding —
(A) the activities and services that will result in increasing the number of youth staying in or returning to school and graduating from high school or the equivalent;
(B) the work-based curriculum that will link classroom learning to work-site experience and address the practical and theoretical aspects of work;
(C) the opportunities that will be made available to participants to obtain career-path employment and postsecondary education;
(D) the integration to be achieved, in appropriate circumstances, in the delivery of services between state and local educational agencies and alternative service providers, such as community-based and non-profit organizations; and
(E) the linkages that will be established, where feasible, to avoid duplication and enhance the delivery of services, with programs under —

(ii) the Elementary and Secondary Education Act (20 U.S.C. 2701, et seq.);
(iii) the Carl D. Perkins Vocational and Applied Technology Education Act (20 U.S.C. 2301, et seq.);
(iv) the Individuals with Disabilities Education Act (20 U.S.C. 1400, et seq.);
(viii) the National and Community Service Act of 1990 (42 U.S.C 12501, et seq.).

Section 265(a) further stipulates the nature of linkages between educational and JTPA programs. The amendments state that such linkages shall include —

(2) arrangements to ensure that the program under this part supplements existing programs provided by local educational agencies to in-school youth;

(3) arrangements to ensure that the program under this part utilizes, to the extent possible, existing services provided by local education agencies to out-of-school youth; and

(4) arrangements to ensure that for in-school participants, there is a regular exchange of information between the program and the educational agency relating to participant progress, problems, and needs, including, in appropriate circumstances, interim assessment results.

The development of meaningful linkages between JTPA and educational programs can, based on the aforementioned collaborative service provisions, provide youth with disabilities comprehensive in-school and out-of-school transition and related services. Today, we recognize that far too many youth with disabilities leave school early. This results in high levels of unemployment among these youth in adult life. Essential relationships between education, JTPA programs, and other community-based organization can go a long way in helping to facilitate the school completion and later-life employability of early school leavers.

■ PIC Membership Expands

Section 112(a)(2) and (3) expands Private Industry Council (PIC) membership to organized labor and community-based organizations. The statutory language states that:

(2) Representatives of organized labor and community-based organizations, shall constitute not less than 15% of the membership of the council;

(3) Representatives of each of the following:
(A) Educational agencies (which agency shall be representative of all educational agencies in the service delivery area).
(B) Vocational rehabilitation agencies.
(C) Public assistance agencies.
(D) Economic development.
(E) Public employment service.

This new section adds organized labor and a percentage for both organized labor and community-based organizations (15%) to make up each PIC. No specific percentage had been mandated previously. The definition of "community-based organizations" is:

Private non-profit organizations which are representative of communities or significant segments of communities and which provide job-training services, . . . neighborhood groups and organizations, community action agencies, . . . vocational rehabilitation organizations, rehabilitation facilities (as defined in Section 7[10] of the Rehabilitation Act of 1973), agencies serving youth, agencies serving the handicapped.

An important strategy in relation to Private Industry Council membership is to ensure that community-based organizations representing youth and adults with disabilities are involved on PICs. You can contact your State Job-training Office for further information concerning current membership lists for Private Industry Councils in your locality.

■ JTPA Accountability to Youth and Adults with Disabilities

Several provisions have been made to ensure that youth and adults with disabilities have full opportunities to participate in JTPA programs. Three primary provisions are presented here. The reader is encouraged, however, to review other sections of the Job Training Reform Amendments of 1992 and the interim final rules published on December 29.

Performance Standards

Under Section 106(g), *Adjustments for Special Populations*, specific performance standards are found. These provisions state:

The Secretary [of Labor] shall prescribe a system for variations in performance standards for special populations to be served, including . . . disabled and Vietnam era veterans, including veterans who served in the Indochina theater between August 5, 1964, and May 7, 1975.

Performance standards are the accountability measure by which the U.S. Department of Labor measures the success of a service delivery area's program. Failure to meet them can lead to an adverse action. Variations to performance standards recognize that services to certain populations may take longer, cost more, etc. Thus, this added flexibility can facilitate the enrollment of persons with disabilities and Vietnam veterans in JTPA programs.

Nondiscrimination

Youth and adults with disabilities are protected against discrimination in all employment training programs under Section 144 of the Job Training Reform Act Amendments of 1992. This amends previous Section 167 of the Act (29 U.S.C. 1577) by adding at the end the following new subsection:

(e)(1) The head of the Office of the Department of Labor referred to as the Directorate for Civil Rights shall annually prepare a report on the administration and enforcement of this section.

(2) The report required by paragraph (1) shall include—
(E) a statistical summary, broken down by race, sex, national origin, disability, or age, of the number of inquiries undertaken and their outcomes;
(F) an identification of any service delivery area or state that has been determined, during the preceding year, to have failed to conduct objective assessments, as required by section 204 and 264, on a non-discriminatory basis;
(I) the number of cases referred to the Attorney General for such cases—
(ii) the use, by the Secretary, of the authority of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000[d], et seq.), the Age Discrimination Act of 1975 (29 U.S.C. 621, et seq.), or Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794).

These provisions ensure that youth and adults who attempt access or who are served by JTPA programs are not discriminated against on the basis of disability, age, national origin, and other characteristics. Infractions of these federal non-discrimination statutes shall be formally tracked, documented, and reported to the Secretary of Labor annually.

Human Resource Investment Councils

Lastly, state-level "Human Resource Investment Councils" are authorized and may be established under the new amendments. The purpose of these councils is to "review the provision of services and the use of funds and resources under applicable Federal human resource programs and advise the Governor on methods of coordinating . . . such programs." The programs this council may review include those authorized under—

this Act;
the Carl Perkins Act;
the National and Community Services Act;
the Adult Education Act;
the Wagner Peyser Act;
part F of Title IV of the Social Security Act; and
the Employment Program of the Food Stamp Act.

It may not include "Programs authorized under the Rehabilitation Act of 1973." Further, with regard to these Councils, "individuals who have special knowledge and qualifications with respect to special education and career development of hard-to-serve individuals" may also be included as members. The effective date for most of the provisions of these amendments is July 1, 1993.

■ State-By-State Participation Rates of Youth and Adults with Disabilities in JTPA Programs

Annually, the President's Committee on Employment of People with Disabilities, in cooperation with the U.S. Department of Labor, reviews and analyzes available data on the participation of people with disabilities in Job Training Partnership Act (JTPA) programs nationally. Table 1 reports on the total number of adults and youth. Selected excerpts from the most recent report, published by the President's Committee on Employment of People with Disabilities in April 1993, entitled *People with Disabilities: In our Nation's Job Training Partnership Act Programs*, are provided here for your review. It is hoped that this information may be useful in making state-by-state comparisons concerning the participation rates of youth and adults with disabilities in JTPA programs.

Table 1 displays the total number of adults and youth who "terminated" from JTPA Title II programs during program year 1991. "Terminees" are defined as JTPA program participants who have separated, that is: (1) those who have entered unsubsidized employment; (2) those who are youth who have received employability enhancement (attained PIC-recognized competencies, entered non-Title II training, returned to full-time school, or completed a major level of education); or (3) all other terminations, successful or otherwise (e.g., dropouts).

The data reported in Table 1 indicate that during the 1991 program year, 271,391 adults terminated from Title II-A programs. Of this number, 29,715 were adults with disabilities. This represents 10.9% of all adult terminees for Title II-A programs. Also during program year 1991, 254,758 youth were terminated from Title II-A programs, of which 38,021 were youth with disabilities.

It is significant to note, in reviewing data from previous years, that the number of adults and youth with disabilities who terminated Title II-A programs has increased over the previous program year's figure (except for program year 1990).

In reviewing Table 1, wide variations among states are noted in the percentage of terminees who are individuals with disabilities. In an effort to find an explanation for this wide variation by state, the President's Committee on Employment of People with Disabilities reviewed population figures for individuals with disabilities for each state to determine whether some states have either a significantly greater or lesser percentage of people with disabilities available to participate in JTPA programs. Findings, however, revealed a relatively constant percentage of people with disabilities from state to state. Thus, it appears that the

Table 1
JTPA Title II-A Programs
Adults and Youth with Disabilities Terminations
Program Year 1991

State	Total Adult Terminees	Adults with Disabilities	%	Total Youth Terminees	Youth with Disabilities	%
Alabama	4,250	435	10.2	5,101	429	8.4
Alaska	659	73	11.1	881	164	18.6
Arizona	3,076	338	11.0	3,078	284	9.2
Arkansas	3,674	289	7.9	4,469	247	5.5
California	25,253	2,513	10.0	21,120	3,338	15.8
Colorado	5,631	831	14.8	3,470	558	16.1
Connecticut	1,572	95	6.0	1,774	455	25.6
Delaware	891	186	20.9	477	166	34.8
District of Columbia	815	42	5.2	177	2	1.1
Florida	16,138	2,100	13.0	15,192	3,204	21.1
Georgia	6,829	664	9.7	6,178	788	12.8
Hawaii	601	64	10.6	684	251	36.7
Idaho	1,459	352	24.1	1,296	261	20.1
Illinois	12,625	1,103	8.7	12,158	2,327	19.1
Indiana	5,842	379	6.5	4,158	582	14.0
Iowa	2,152	296	13.8	1,415	289	20.4
Kansas	1,338	170	12.7	1,145	241	21.0
Kentucky	5,076	406	8.0	6,999	725	10.4
Louisiana	7,131	354	5.0	11,003	821	7.5
Maine	746	123	16.5	485	123	25.4
Maryland	6,654	358	5.4	4,178	510	12.2
Massachusetts	3,540	261	7.4	3,488	536	15.4
Michigan	15,352	2,536	16.5	10,769	2,394	22.2
Minnesota	6,431	761	11.8	3,162	617	19.5
Mississippi	8,084	666	8.2	7,936	405	5.1
Missouri	5,559	353	6.4	5,843	776	13.3
Montana	1,258	271	21.5	831	127	15.3
Nebraska	839	136	16.2	712	90	12.6
Nevada	1,005	134	13.3	1,054	267	25.3
New Hampshire	643	86	13.4	545	227	41.7
New Jersey	4,456	198	4.4	3,268	834	25.5
New Mexico	1,559	157	10.1	2,147	381	17.7
New York	16,274	1,471	9.0	12,409	1,717	13.8
North Carolina	5,258	567	10.8	5,312	1,068	20.1
North Dakota	491	97	19.8	391	65	16.6
Ohio	15,823	1,432	9.1	13,074	2,585	19.8
Oklahoma	3,413	159	4.7	3,027	260	8.6
Oregon	3,562	508	14.3	2,588	338	13.1
Pennsylvania	9,629	771	8.0	7,022	1,379	19.6
Rhode Island	629	23	3.7	887	182	20.5
South Carolina	2,949	331	11.2	3,353	285	8.5
South Dakota	1,268	165	13.0	1,080	255	23.6
Tennessee	5,229	378	7.2	6,980	1,505	21.6

continued on next page

Table I continued

State	Total Adult Terminees	Adults with Disabilities	%	Total Youth Terminees	Youth with Disabilities	%
Texas	17,692	1,606	9.1	22,629	1,654	7.3
Utah	1,343	281	20.9	842	162	19.2
Vermont	1,028	121	11.8	588	196	33.3
Virginia	5,319	646	12.1	4,487	1,544	34.4
Washington	4,288	700	16.3	4,086	513	12.6
West Virginia	3,058	2,412	78.9	2,055	42	2.0
Wisconsin	5,600	1,095	19.6	4,639	1,534	33.1
Wyoming	735	127	17.3	543	71	13.1
American Samoa	306	3	1.0	187	0	0.0
Micronesia	661	0	0.0	993	44	4.4
Guam	169	16	9.5	478	89	18.6
Marshall Islands	115	2	1.7	724	7	1.0
Northern Marianas	9	2	22.2	28	11	39.3
Palau	82	3	3.7	37	1	2.7
Puerto Rico	5,260	69	1.3	11,036	95	0.9
Virgin Islands	63	0	0.0	90	0	0.0
U.S. TOTALS	**271,391**	**29,715**	**10.9**	**254,758**	**38,021**	**14.9**

availability or prevalence of individuals with disabilities is not a factor in explaining the wide variation by state.

Further investigation by the President's Commitee on Employment of People with Disabilities indicates that there are probably two main factors affecting the number and percentage of the total population of individuals with disabilities served by JTPA programs on a state-by-state basis. They are:

- **Involvement of Organizations**: It appears that the extent of involvement of groups and organizations representing people with disabilities in the policy or management of JTPA programs (at either the state or SDA level, most often at both levels), has a major affect on the number of individuals with disabilities identified and served by JTPA programs in a state. In states where disability-related organizations were active in promoting their JTPA program's involvement in serving eligible people with disabilities, the President's Committee found greater numbers of people with disabilities actually served. Conversely, in states where disability-related groups were less involved in JTPA programs, lower percentages of people with disabilities were found as program participants.

- **Unemployment Rates**: A second factor found by the President's Committee on Employment of People with Disabilities to contribute to the wide state-by-state (and in many cases, SDAs) variation in the proportion of individuals with disabilities served in JTPA programs was the state's or SDA's unemployment rate. In those states or SDAs with unemployment rates higher than the national average, the proportion of JTPA Title II-A terminees with disabilities tended to fall below the national average. The converse also tends to be true; in states where unemployment rates are lower than the national average, individuals with disabilities make up a larger proportion of the total number of individuals terminated from JTPA Title II-A programs.

■ Strategies for Increasing Participation Levels Among Youth and Adults with Disabilities

The President's Committee offers some strategies and recommendations for state and local programs in their efforts to increase the number of people with disabilities in their programs. These strategies include:

- The new amendments appear to encourage broader participation among organized labor and community-based organizations on Private Industry Councils. State and local agencies and organizations should review the membership makeup of their Private Industry Councils or State Job-Training Coordinating Council to ensure that individuals with disabilities, or those who represent the training and employment needs of people with disabilities, are included as members of both decision-making bodies.

- ❑ When establishing priorities for funding or issuing requests for proposals, indicate the need to serve people with disabilities along with various targeted sub-groups, i.e., women, minorities, displaced workers, etc.
- ❑ Publicize the "family of one" authority for youth and adults with disabilities among all intake workers.
- ❑ Engage in informational outreach activities with a variety of organizations and agencies involved in serving people with disabilities. These include state vocational rehabilitation programs, state and local special education units, organizations of people with disabilities, and parent groups. Additional information about these groups can be obtained by consulting local phone and resource directories.
- ❑ Educational and community service agencies (i.e., vocational rehabilitation, human services, others) should actively encourage JTPA program representatives to participate on interagency teams addressing the transition needs of youth with disabilities. Active discussions concerning resource pooling and cost-sharing strategies to support a broad range of training and employment goals for youth with disabilities should be undertaken.

Persons interested in securing additional information concerning the Job Training Reform Amendments of 1992 and/or the interim final rules published in the *Federal Register, vol. 57*, on December 29, 1992, should consult with their State Job Training Office or local service delivery area representative. Individual copies of the report entitled *People with Disabilities: In Our Nation's Job Training Partnership Act Programs* (program year 1991) may be requested from the President's Committee on Employment of People with Disabilities, 1331 F Street NW, Washington, D.C. 20004-1107.

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